

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CLIFFORD THOMAS,)
Plaintiff/Counterclaim Defendant,)
v.) Civil Action No. 16-1581 (AJT/MSN)
RAYMOND ROBERTS,)
Defendant/Counterclaimant.)

)

**DEFENDANT/COUNTERCLAIMANT RAYMOND ROBERTS'
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Defendant/counterclaimant Raymond Roberts, pursuant to Fed. R. Civ. P. 37(a), moves for an order compelling a complete production of responsive documents from plaintiff/counterclaim defendant. The grounds for the motion are fully set forth in the accompanying memorandum. The undersigned certifies that a good-faith effort to narrow the areas of disagreement has been made in accordance with Local Rules 7(E) and 37(E).

Respectfully submitted,

/s/ Charles B. Wayne
Charles B. Wayne (VSB # 24954)
Katherine Ruffing (VSB # 79006)
Brian J. Young
DLA PIPER LLP (US)
500 8th Street, N.W.
Washington, D.C. 20004
(202) 799-4253
(202) 799-5253 (fax)
charles.wayne@dlapiper.com
katie.ruffing@dlapiper.com
brian.young@dlapiper.com
*Counsel for Defendant/Counterclaimant
Raymond Roberts*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2017, a copy of the foregoing was served by electronic mail using the CM/ECF system, which will then send notification of such filing to all counsel of record.

/s/ Charles B. Wayne
Charles B. Wayne